

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney
MICHELLE LO (NYRN 4325163)
Chief, Civil Division
MOLLY A. FRIEND (CABN 289677)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7177
FAX: (415) 436-7234
molly.friend@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHARON S. CHAND,

Plaintiff,

v.

MICHAEL S. REGAN, Administrator,
Environmental Protection Agency,

Defendant.

) No. 3:21-cv-07773-RS
)
) **STIPULATION TO CONTINUE CASE**
) **MANAGEMENT DEADLINES;**
AS MODIFIED BY THE COURT

Pursuant to Civil Local Rules 6-2 and 7-12, the Parties to the above captioned action hereby submit the below Stipulation and Proposed Order to continue the remaining deadlines in the Court's Case Management Scheduling Order. Dkt. No. 54.

Pursuant to the Court's Case Management Scheduling Order, the following deadlines remain in the above action: (1) all dispositive pretrial motions must be filed and served by June 21, 2024, and heard no later than August 1, 2024; (2) the final pretrial conference is to be held on October 2, 2024; (3) the Joint Pretrial Statement and Proposed Order shall be filed on September 20, 2024; and (4) trial is set to commence on October 28, 2024. Dkt. No. 54.

Subject to the Court's approval, the Parties agree to stipulate to continue these deadlines by five

1 weeks. The continuance is requested in order to accommodate certain scheduling conflicts, to allow
2 additional time to prepare pretrial motions, and to engage in additional settlement discussions prior to
3 trial if needed.

4 As such, the Parties agree to stipulate the following proposed new schedule:

- 5 • **July 26, 2024:** All dispositive pretrial motions must be filed and served
- 6 • **September 5, 2024:** Last day to hear dispositive pretrial motions
- 7 • **November 12, 2024, 1:30 p.m.:** Final pretrial conference
- 8 • **October 25, 2024:** Joint Pretrial Statement and Proposed Order due filed
- 9 • **December 2, 2024, 9:00 a.m.:** Jury trial to commence.

10 A proposed Order is attached.

11
12 DATED: June 18, 2024

Respectfully submitted,

13
14 ISMAIL J. RAMSEY
United States Attorney

15 /s/ Molly A. Friend
16 MOLLY A. FRIEND
Assistant United States Attorney

17 *Attorneys for Defendant*

18
19 DATED: June 17, 2024

20
21 /s/ Sharon S. Chand*
22 SHARON S. CHAND

23 *Pro Se Plaintiff*

24
25 ** In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of*
26 *perjury that all signatories have concurred in the filing of this document.*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The remaining deadlines set by the Court's Case Management Scheduling Order are continued to as follows:

- **July 26, 2024:** All dispositive pretrial motions must be filed and served
- **September 5, 2024:** Last day to hear dispositive pretrial motions
- **November 12, 2024, 1:30 p.m.:** Final pretrial conference
- **October 25, 2024:** Joint Pretrial Statement and Proposed Order due filed
- **December 2, 2024, 9:00 a.m.:** Jury trial to commence.

DATED: June 18, 2024



CHIEF DISTRICT JUDGE RICHARD SEEBORG